

# State of California



## Fair Political Practices Commission

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July 31, 1985

Richard Napier  
754 Carlisle Way  
Sunnyvale, CA 94087

Re: FPPC Advice No. A-85-168

Dear Mr Napier:

This is to confirm our telephone conversation of today, regarding the campaign disclosure provisions of the Political Reform Act.

You asked for clarification of your filing requirements as a candidate for the Sunnyvale City Council. The facts as I understand them are that you created a committee in November, 1984; you were a candidate in the March 5, 1985 city council election; and you are a candidate in the November 5, 1985 city council election. You filed the campaign statements in connection with the March 5, 1984 election; the post-election statement in connection with the March 5, 1984 election was filed on May 9, 1985.

You asked the following questions:

- (1) Are you required to file a semi-annual statement for the period ending June 30, 1985?
- (2) What is the period covered by the next statement you will be required to file?
- (3) What is the cumulation period for the next statement you will be required to file?

Following are the answers to your questions:

- (1) You are not required to file a semi-annual statement for the period ending June 30, 1985. Gov. Code Section 84200(a) provides that candidates and committees which are required to file a post-election statement in connection with an election held during the six-month period covered by a semi-annual statement, are not required to file the semi-annual statement.

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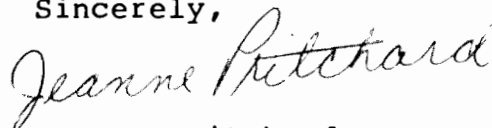
(2) The period covered by the next campaign statement you are required to file will begin with the day after the closing date of the last statement you filed. (Since the post-election statement in connection with the March 5, 1984 election covered a period ending on May 2, 1985, the next statement you file will cover a period beginning with May 3, 1985.)

(3) The cumulation period for contributions and expenditures is a calendar year. (There are two exceptions to calendar year cumulation, neither of which applies to your situation.) Therefore, you must cumulate contributions received for the entire calendar year, and must itemize on your campaign statement the required information for any person who contributes \$100 or more in a calendar year. In addition, for purposes of completing the "Summary Page" of your campaign statement, you must carry over the "cumulative to date" figures (Column C of the Summary Page) from your post-election statement, to the "cumulative total from previous period" (Column A of the Summary Page) of your next statement. The cumulative amount of all receipts and all expenditures runs for the entire calendar year, and ends on December 31 of each year. When you file a statement for a new calendar year, you do not carry over the cumulative amounts of contributions and expenditures from the previous year. You do, however, carry over any outstanding loans, pledges or accrued expenses.

You specifically asked if the method of cumulation means that your receipts and expenditures for both elections are added together. The answer is yes. Because both elections are held in the same calendar year, the receipts and expenditures for both are added together.

I hope this clarifies your filing requirements. I apologize for the confusion caused by any conflicting advice you may have received.

Sincerely,



Jeanne Pritchard  
Political Reform Consultant

JP:kt